
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Honorable Mark Falk, U.S.M.J.
	:	Mag. No. 14-3545
v.	:	
	:	
ROBERT RICHARDSON	:	CRIMINAL COMPLAINT

I, Christopher F. Algieri, being duly sworn, state the following is true and correct to the best of my knowledge and belief

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Veterans Affairs, Office of the Inspector General, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

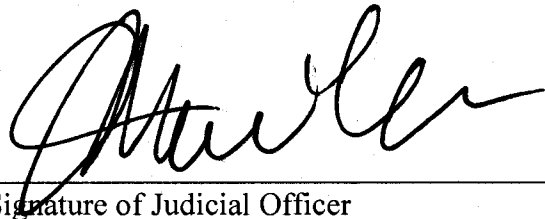
continued on the attached page and made a part hereof.



Christopher F. Algieri, Special Agent
U.S. Department of Veterans Affairs
Office of the Inspector General

Sworn to before me and subscribed in my presence,
February 18, 2014 at Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

Count I

On or about February 3, 2014, in Essex County, in the District of New Jersey, and elsewhere, defendant

ROBERT RICHARDSON

did forcibly intimidate and assault "Victim One", a person designated in Title 18, United States Code, Section 1114, namely a social worker employed by the Department of Veterans Affairs, while "Victim One" was engaged in and on account of performance of "Victim One's" official duties, inflicting bodily injury.

In violation of Title 18, United States Code, Sections 111(a)(1) and (b) and Section 2.

ATTACHMENT B

I, Christopher F. Algieri, am a Special Agent with the United States Department of Veterans Affairs, Office of the Inspector General. I am fully familiar with the facts herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to me and other investigators concerning the investigation.

1. The United States Department of Veterans Affairs (hereinafter "VA") is an agency of the United States government. The VA operates a medical facility in East Orange, New Jersey, the East Orange Veterans Affairs Medical Center ("EOVAMC"), which is located at 385 Tremont Avenue in East Orange, New Jersey.

2. On or about February 3, 2014, "Victim One" was employed by the VA as a social worker at the EOVAMC. "Victim One" is, therefore, an officer or employee of the United States as defined in Title 18, United States Code, Section 1114.

3. On or about February 3, 2014, Defendant Robert RICHARDSON ("RICHARDSON"), a patient at the EOVAMC, entered the Patient Care Service Department on the seventh floor of the EOVAMC, spoke to "Victim One," and requested to make a telephone call within the VA to a phone extension with which "Victim One" was not familiar. "Victim One", whose office is near both the entrance to the Patient Care Service Department and the Department's waiting area, directed RICHARDSON to use the phone in the waiting area and have the operator transfer his call.

4. While in the waiting area, RICHARDSON became agitated and began making derogatory statements to "Victim One", whose office is in close proximity to the waiting area.

5. RICHARDSON then approached "Victim One's" office, while continuing to making derogatory statements to "Victim One," including grabbing his crotch and threatening to sexually assault "Victim One."

6. RICHARDSON entered "Victim One's" office, and "Victim One" requested more than once that RICHARDSON leave "Victim One's" office.

7. RICHARDSON refused to leave and continued to verbally threaten "Victim One."

8. RICHARDSON, while continuing to verbally threaten "Victim One," spit in "Victim One's" face and swung his metal cane at "Victim One's" head. "Victim One" raised her hands in an attempt to block the blow, and RICHARDSON struck "Victim One" in the left elbow. As a result of this incident, "Victim One" suffered a fractured elbow.